

EXHIBIT 11

From: Rivera, Sylvia <SRivera@mofo.com>
Sent: Thursday, June 15, 2017 2:05 AM
To: QE-Waymo; 'John Cooper'; Matthew Cate
Cc: UberWaymoMoFoAttorneys; Boies Service (BSF_EXTERNAL_UberWaymoLit@bsfllp.com); Rachel Walsh (RWalsh@goodwinlaw.com); Shane Brun (SBrun@goodwinlaw.com); Brett Schuman (BSchuman@goodwinlaw.com); Neel Chatterjee (nchatterjee@goodwinlaw.com)
Subject: RE: Waymo v. Uber Meet and Confer Summary

Counsel,

I write in regard to our ongoing meet and confer regarding Uber's responses to Set 2 of Waymo's Expedited RFPs and Interrogatories, which were discussed on our June 12 call.

Expedited RFP 10

You asked if we were withholding anything in response to RFP 10. As stated in our written response, we agreed to produce lab notebooks belonging to LiDAR personnel who work primarily on LiDAR. We are not producing lab notebooks for employees with only an attenuated relationship to LiDAR projects. To the extent the request seeks those, it is overbroad and not "reasonably narrow." We are not withholding any notebooks "associated with LiDAR workstations."

Expedited RFP 13

On our call you asked for confirmation of whether there are any responsive texts within Uber's possession, custody, or control. We've followed up on this and I expect to receive confirmation tomorrow that there are none.

Expedited RFP 15

On our call you asked whether Uber would also produce in response to this request copies of text messages, which Quinn already inspected. Those will be produced, either tomorrow or Friday.

Expedited RFPs 14-17

On our call you asked when the production of responsive documents would be complete. That production is now complete (as is RFP 13, with the exception of the texts you already inspected).

Your email below states that I committed to responding about whether Uber's production for RFPs 14-17 would include texts, but that question was only raised as to RFP 13 and 15. We will revert regarding 14 and 16.

Expedited RFP 18

To resolve this RFP, Mr. Cooper suggested Uber produce redacted versions of the Stroz invoices if a further appeal is taken. I agreed.

Expedited RFP 19

Uber produced responsive, non-privileged documents from its broadened search on June 12.

Expedited RFP 25

I anticipated we could produce a closing checklist today. However, the versions we've located contain heavy attorney "track changes" and highlighting throughout, rendering it difficult to redact and remain legible. We're working to find an alternative and expect to have resolution by tomorrow evening.

Expedited Rog 14, 16

We expect to produce documents by Monday.

Best,
Sylvia

From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]

Sent: Tuesday, June 13, 2017 10:18 PM

To: UberWaymoMoFoAttorneys; Boies Service (BSF_EXTERNAL_UberWaymoLit@bsflp.com); Rachel Walsh (RWalsh@goodwinlaw.com); Shane Brun (SBrun@goodwinlaw.com); Brett Schuman (BSchuman@goodwinlaw.com); Neel Chatterjee (nchatterjee@goodwinlaw.com); 'John Cooper'; Matthew Cate

Cc: QE-Waymo

Subject: Waymo v. Uber Meet and Confer Summary

- External Email -

John and Counsel,

I write regarding the issues discussed on our June 12 meet and confer relating to Uber and Ottomotto's (collectively "Uber's") responses to Waymo's second set of expedited RFPs and interrogatories.

Expedited RFP 10: Ms. Rivera said that she would confer with her team regarding the questions raised in Mr. Judah's June 11 email and would provide a response by email on Wednesday, June 14.

Expedited RFP 13: Ms. Rivera said that responsive documents would be produced in the next two days. In her June 13 email, she said that she expects to produce documents responsive to this request tomorrow. Will that complete the production of documents Uber agrees to produce in response to this RFP?

Additionally, we asked whether Uber's production would be limited to email communications or would include other communications, such as texts. Ms. Rivera was not sure and committed to getting back to us by email on Wednesday, June 14.

Expedited RFPs 14-17: Ms. Rivera did not know when these documents would be produced. In her June 13 email, she said that she expects to produce documents responsive to this request tomorrow. Will that complete the production of documents Uber agrees to produce in response to this RFP?

Additionally, we asked whether Uber's production would be limited to email communications or would include other communications, such as texts. Ms. Rivera was not sure and committed to getting back to us by email on Wednesday, June 14.

With respect to Expedited RFP 15 in particular, Ms. Rivera said that Waymo has inspected the responsive emails and so Uber hadn't planned to produce them. Uber, however, agreed to produce the communications at issue in its written responses. Please tell us by Wednesday, June 14 if Uber does not agree to produce these documents.

Expedited RFP 18: Ms. Rivera said that the invoices from Stroz reflect a substantive description of the work performed. We asked if there are redacted versions of the invoices, reserving our right to request more. Mr. Cooper asked how many invoices there are and if it makes sense to do the work to redact them before a ruling on Judge Corley's June 5 order. Ms. Rivera did not know how many invoices there are and agreed to find out and provide a response on Wednesday, June 14.

Expedited RFP 19: Ms. Rivera confirmed that she agreed with the account of the parties' agreement on this request reflected in Mr. Judah's June 9 email, with two exceptions. First, Uber has not agreed it will produce or log all emails regardless of subject matter. She is not aware of any communications that do not relate to Stroz and will need to confer with Waymo if there are. Second, she clarified that Uber is broadening the scope of its search, but didn't agree that they would do so by last Friday. We asked for the timeline for when this search and production would be completed. Ms. Rivera did not know. Uber will provide a response on Wednesday, June 14.

Expedited RFP 20: We discussed this request again on our meet and confer today. Uber will provide an update by COB on Wednesday, June 14 as to whether they will produce or make available for inspection the requested software modules. If Waymo is not satisfied with Uber's response, it will file 2-page letter brief by COB on Thursday, June 15, and Uber will file a 2-page response by COB on Friday, June 16. Note that on the June 12 meet and confer, we suggested that Uber talk to Don Burnette about these software modules, in addition to whomever else Uber is talking to.

Expedited RFP 21: Ms. Rivera said Uber conducted a reasonably diligent search and did not locate any responsive documents other than those identified in the response. She further said that if there are agreements between Tyto and/or Odin Wave and Levandowski, Uber does not have them in its possession, custody, or control. Uber will supplement its response to this interrogatory to make this clear. Uber should do so by Thursday, June 15.

Expedited RFP 25: Ms. Rivera said that this request calls for an inordinately large number of documents. Mr. Cooper suggested that Uber produce a redacted version of the closing checklist-redacting only privileged information—before noon on Wednesday, June 14. After reviewing that checklist, Waymo reserves the right to seek additional information. In particular, as we explained, Waymo would like to know what the closing conditions were and how they were satisfied.

Expedited RFP 26: Ms. Rivera confirmed that Uber conducted a reasonably diligent search and did not locate any responsive documents.

Expedited Interrogatory 14 and 16: Ms. Rivera confirmed that Uber is searching for responsive documents, will produce them on an expedited basis, and will supplement the interrogatory responses to cite to them. She did not know the timeframe of when this will be complete and committed to providing an update on Wednesday, June 14. Mr. Cooper also asked that the update include an estimate of the volume of documents.

Expedited Interrogatory 19: Ms. Rivera confirmed that Uber is not withholding information on the basis of its compound objection.

Expedited Interrogatory 20: We agreed to address this issue after Uber provides additional information regarding Expedited RFP 19.

Thanks,

Andrea

Andrea Pallios Roberts
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